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JAN P. JOHNSON  
Standing Chapter 12 Trustee  
Kristen A. Koo, State Bar #230856  
Karin M. Bruce, State Bar #292245  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

IN RE:	)	Case No:15-29136-A-12
	)	DC No.: JPJ-2
	)	
P&M SAMRA LAND	)	
INVESTMENTS, LLC,	)	<b>TRUSTEE’S MOTION TO DISMISS</b>
	)	
	)	
	)	DATE: FEBRUARY 5, 2018
	)	TIME: 10:00 A.M.
Debtor(s)	)	COURTROOM: 28

JAN P. JOHNSON, CHAPTER 12 TRUSTEE, hereby moves the Court for an Order  
Dismissing this case pursuant to 11 U.S.C. §1208, and as supported by the attached declaration  
for the following reason(s):

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///

1 The debtor is delinquent to the trustee in the amount of \$76,644.93 which represents the  
2 annual plan payment that was due on December 25, 2017. Before this motion will be heard, an  
3 additional monthly plan payment in the amount of \$6,875.00 will also be due. There is cause to  
4 dismiss this case pursuant to 11 U.S.C. §§1208(c)(1) and (c)(6).

5 WHEREFORE, the Trustee asks that the Court grant an Order Dismissing this  
6 proceeding.

7 Dated: January 17, 2018

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9 /s/ Karin M. Bruce  
10 KARIN M. BRUCE, Attorney for Trustee  
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